

TITLE V COMPLIANCE TRAINING

WORKSHOP MANUAL

**Stationary Source Program
Air Quality Division
Idaho Department of Environmental Quality
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INTRODUCTION



Title V

- **One permit to implement requirements of the Clean Air Act**
- **Enhanced public participation**
- **Permit compliance is also enhanced**



Title V Permits

- **Do not create new requirements such as emissions limits**
- **Do require semiannual monitoring reporting**
- **Do require reporting of deviations from permit requirements**
- **Do require annual compliance certification**



Purpose of The Workshop

- **Ensure permit holders understand requirements for semiannual reporting and annual compliance certification**
- **Provide a streamlined way for facilities to report and submit certifications**



TIER I MONITORING REPORTS



Deviations and Prompt Reporting

- **Basis: IDAPA 58.01.01.322.08.b**
 - **Which states:** *“Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with Sections 130-136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c unless the permit specifies another timeframe. The reports shall describe the probable cause of such deviation and any corrective actions or preventative measures taken.”*



What is a Deviation?

- **Deviation from permit requirements**
 - Any situation in which an emissions unit fails to meet a permit term or condition
 - Emissions control device does not meet a required operating condition
 - Observations or collected data that demonstrate noncompliance with an emissions standard
 - Failure to comply with a permit term that requires a report



What Does Prompt Mean?

- **If deviation is an excess emissions event as defined in Sections 130-136, prompt means reporting pursuant to Sections 130-136**
- **Permit requirement (or underlying applicable requirement) specifies reporting frequency, if more frequent than semiannually**
- **If permit does not specify monitoring reporting frequency, submit reporting at least every six months**



Monitoring Reports

- **Basis: IDAPA 58.01.01.322.08.c**
 - **Which states:** “...Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. ...”
- **Incorporated into Tier I General Provisions - see General Provisions 24 & 25**



Semiannual Monitoring Report Content

- **What monitoring data should be provided?**
 - Status of monitoring
 - | Do not submit data unless DEQ specifically requests
 - Details on deviations, causes, corrective actions, and preventative measures
 - Need not include bona fide upsets, malfunctions, or deviations previously reported per Sections 130-136



Semiannual Monitoring Report Forms

- **Standard DEQ forms developed**
 - ♣ Tier I Semiannual Report, [AQ-C4](#)
 - ♣ Semiannual Monitoring Table, [AQ-C5](#)
- **Submit completed forms to comply with permit and rules**



Semiannual Deviation Reports

- **Basis: IDAPA 58.01.01.322.08.c**
 - **Which states:** *“Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. All required reports must be certified.”*



Deviation Form

- **Standard DEQ form developed**
 - ♣ Tier I Deviation Summary Table, [AQ-C3](#)



Deviation Reports

- **Basis: IDAPA 58.01.01.322.08.b**
 - **Which states:** *“Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with Sections 130-136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c unless the permit specifies another timeframe. The reports shall describe the probable cause of such deviation and any corrective actions or preventative measures taken.”*



Section 130-136 Deviations

- **Deviation from startup, shutdown, maintenance, safety measures, upset, and breakdown**
 - Reported promptly under Sections 130-136
 - Not itemized on Semiannual Deviation Form (AQ-C3)
 - Listed in the Annual Compliance Certification Table (AQ-C2)



Deviation Other Than Section 130-136 Deviation

- **List on Semiannual Deviation Form
(AQ-C3)**
- **List on Annual Compliance Certification Table
(AQ-C2)**

Excerpt from IDAPA 58.01.01.
Re: Semiannual Reports

IDAPA 58.01.01.322:

08. Reporting. All Tier I operating permits shall incorporate by reference all applicable requirements regarding reporting and require all of the following: (5-1-94)

a. Sufficient reporting to assure compliance with all of the terms and conditions of the Tier I operating permit. (5-1-94)

b. Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with the requirements of Sections 130 through 136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c. unless the permit specifies another time frame. The reports shall describe the probable cause of such deviations and any corrective actions or preventative measures taken. (3-23-98)

c. Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. All required reports must be certified in accordance with Section 123. (4-5-00)

Example of Tier I Operating Permit General Provision
Re: Semiannual Reports

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six (6) months starting six (6) months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

**[IDAPA 58.01.01.322.15.q, 3/23/98;
IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]**

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

TIER I SEMIANNUAL REPORT

FORM AQ-C4

FACILITY INFORMATION

Facility/Permittee Name: _____
Co-Permittee Name(s): _____
Facility Location: _____
AIRS Facility No.: _____
Facility Contact: _____ Ph: _____ Fax: _____

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: _____ Issuance Date: _____
Tier I Operating Permit No.: _____ Issuance Date: _____
Compliance Reporting Period: From: _____ To: _____
Deviations Reported This Period? ☐ Yes ☐ No

List of Attachments: ☐ Semiannual Monitoring Table (Form AQ-C5) No. of Pages: _____
☐ Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: _____
☐ Other: _____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____

Certification of Truth, Accuracy, and Completeness (by Responsible Official)

I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature Responsible Official Title Date

Print or Type Responsible Official Name

Co-Permittee Responsible Official Signature Co-Permittee Responsible Official Title Date

Print or Type Co-Permittee Responsible Official Name

INSTRUCTIONS FOR TIER I SEMIANNUAL REPORT

FORM AQ-C4

In accordance with IDAPA 58.01.01.322.08.b and c, compliance with Tier I operating permits requires submittal of a Semiannual Report. The permittee may comply with these requirements by submitting completed copies of this Semiannual Report (Form AQ-C4), the Semiannual Monitoring Table (Form AQ-C5), and the Semiannual Deviation Summary Table (Form AQ-C3) to the Department. As the Annual Compliance Certification (Form AC-C1) and the Annual Compliance Certification Table (Form AQ-C2) incorporate the reporting requirements of the Semiannual Report (in accordance with IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line.

Compliance Reporting Period:

Enter the time period which is addressed by this Semiannual Report (e.g., January 10, 2003 to July 9, 2003).

Deviations Reported this Period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. If the answer is yes, attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Semiannual Report.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for a Semiannual Report. Without this certification, the Semiannual Report does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Semiannual Report to the DEQ Regional Office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.

TIER I SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Facility/Permittee Name: _____

Tier I Operating Permit No.: _____

Facility Location: _____

Issuance Date: _____

AIRS Facility No.: _____

Compliance Reporting Period: _____

1 Permit Condition	2 Condition Title / Description	3 Comments

INSTRUCTIONS FOR TIER I SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Column 1: Permit Condition Number

Enter the number of each permit condition or term that addresses monitoring, exactly as it appears in the Tier I permit.

Column 2: Permit Condition Title or Description

Enter the permit condition title or a brief summary to describe the requirement(s) of the permit condition.

Column 3: Comments

Describe the monitoring that was conducted during the reporting period.

- Monitoring includes any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. For example, this would include fuel use or process rate monitoring, fuel analyses, operational or control device parameter monitoring (e.g., pressure drop), hours of operation, etc.
- Monitoring includes conditions for testing and the recordkeeping associated with that testing.
- Information may also be provided for any other material information which will be used to determine compliance status in the Annual Compliance Certification (i.e., information beyond required monitoring which may potentially affect the compliance status).
- Note that each instance where monitoring was not performed as specified in the permit is a deviation. This must be entered into the Semiannual Deviation Summary Table (Form AQ-C3) if not previously reported.
- If the monitoring required by the condition in Column 1 was impacted by any permit deviations that occurred during the semiannual reporting period (if any), briefly describe this impact in Column 3. Consider deviations reported on the Deviation Summary Table (Form AQ-C3) as well as other deviations that were reported promptly at an earlier date (e.g., excess emissions events, NSPS report per 40 CFR 60.7(c), etc.).

TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility/Permittee Name: _____

Tier I Operating Permit No.: _____

Facility Location: _____

Issuance Date: _____

AIRS Facility No.: _____

Compliance Reporting Period: _____

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1											
2											
3											
4											
5											
6											
7											
8											

INSTRUCTIONS FOR TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

The purpose of the Semiannual Deviation Summary Table (Form AQ-C3) is to provide information required by IDAPA 58.01.01.322.08. Each and every permit condition is subject to prompt deviation reporting. Deviation reports are due at least every six months unless the permit specifies another time frame. All instances of deviations from permit requirements must be clearly identified in the report. Deviations attributable to excess emissions must be reported in accordance with IDAPA 58.01.01.130-136 and, therefore, are not required to be addressed on this form.

Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard.
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventative Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.



TIER I ANNUAL COMPLIANCE CERTIFICATIONS



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.a.**

Which states:

“11. Periodic Compliance Certifications. Each Tier I operating permit shall require submittal of compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:

a. Compliance certifications for all emissions units shall be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the Department.”

- **Incorporated into Tier I General Provisions - see General Provision 21**



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.c.i**

Which states:

“c. The compliance certification shall be in an itemized format providing the following information:

i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;”



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.c.ii**

Which states:

“c. The compliance certification shall be in an itemized format providing the following information:

i. . . .

ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by the Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act which prohibits knowingly making a false certification or omitting material information;”



Compliance Determination Methods

- **As specified in the permit**
- **As described in the permit memo**
- **Other material information**



Compliance Determination Methods (cont.) Other Material Information

- If known, “other material information” must be identified and addressed
- Merely emphasizes the general prohibition in section 113(c)(2) of the Act on knowingly making a false certification or omitting material information
- Similar to the term “other credible evidence” which refers to other “readily available information”
- Information that is readily available and already being utilized, such as engineering calculations, indirect emissions estimates, and direct measurement by various means, whether required to be collected by a regulation or permit, or for some other purpose
- No duty imposed to assess every possible piece of information that may have some undetermined bearing on compliance



Compliance Determination Methods (cont.)

For each compliance determination method, indicate whether data collected is:

- **Continuous, or**
- **Intermittent**



Continuous and Intermittent Data

- **Continuous data:** the results of monitoring, including the results of instrumental or noninstrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure that is designed to serve as monitoring on a continuous basis, provided: (1) the number of data records generated is equivalent to the number of averaging periods for the permit term and condition over the reporting period of the compliance certification, (2) the data have the same averaging period as the permit term and condition, and (3) the data are in the same units as the permit term and condition, or correlated directly with that permit term and condition.
- **Intermittent data:** data which are not continuous data.



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.c.iii**

Which states:

“c. The compliance certification shall be in an itemized format providing the following information:

i. . . .

ii. . . .

iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by certification, based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and”



Compliance Status Decisions

For each permit term or condition, indicate if compliance was:

- **Continuous, or**
- **Intermittent**



Compliance Status

- **Continuous compliance** means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for upsets or malfunctions during which compliance is not required. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and noninstrumental (e.g., visual observation, inspection, recordkeeping) forms of monitoring.
- **Intermittent compliance** means any form of compliance other than continuous compliance.



Tier I Annual Compliance Certification Forms

- **Standard forms developed to:**
 - Streamline compliance
 - Minimize repetition
 - Enable cross-referencing to permit



Tier I Annual Compliance Certification Forms (cont.)

- **Complete Annual Compliance Certification includes:**
 - ♣ Tier 1 Annual Compliance Certification, [AQ-C1](#)
 - ♣ Tier I Annual Compliance Certification Table, [AQ-C2](#)
 - ♣ Tier I Deviation Summary Table, [AQ-C3](#)



Semiannual Monitoring Report as Part of an Annual Compliance Certification

- **The Annual Compliance Certification, Form AQ-C1, should clearly indicate that it includes the Semiannual Monitoring Report information**
- **The Annual Compliance Certification Table, Form AQ-C2, should be used to report the monitoring requirements**
- **Any additional monitoring information required to be included with the Semiannual Monitoring Report should be attached**



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.c.iv**

Which states:

“c. The compliance certification shall be in an itemized format providing the following information:

i. . . .

ii. . . .

iii. . . .

iv. Such information as the Department may require to determine the compliance status of the emissions unit.”



Annual Compliance Certifications

- **Basis: IDAPA 58.01.01.322.11.d**

Which states:

“All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA;”

Excerpt from IDAPA 58.01.01.
Re: Periodic Compliance Certifications

IDAPA 58.01.01.322

11. Periodic Compliance Certifications. Each Tier I operating permit shall require submittal of compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:

(5-1-94)

a. Compliance certifications for all emissions units shall be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the Department. (5-1-94)

b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards and work practices. (5-1-94)

c. The compliance certification shall be in an itemized format providing the following information:

(5-1-94)

i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification; (4-5-00)

ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by the Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act which prohibits knowingly making a false certification or omitting material information; (4-5-00)

iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by certification, based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and (4-5-00)

iv. Such information as the Department may require to determine the compliance status of the emissions unit. (4-5-00)

d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA; (5-1-94)

Example of Tier I Operating Permit General Provision
Re: Periodic Compliance Certification

Periodic Compliance Certification

- 21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
 - 21.1 Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
 - 21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
 - 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
 - 21.3.4 Such other facts as the Department may require to determine the compliance status of the source.
 - 21.4 All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

**[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended;
62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]**

Clarification on “Other Material Information”

Re: 2nd paragraph of Section II.K.2, of 62 FR 54900, October 22, 1997:

In addition, if the owner or operator knows of other material information (i.e., information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. This requirement merely emphasizes the general prohibition in section 113(c)(2) of the Act on knowingly making a false certification or omitting material information and the general criminal section on submitting false information to the government codified at 18 USC 1001. The revised part 70 provision does not impose a duty on the owner or operator to assess every possible piece of information that may have some undetermined bearing on compliance.

Re: page 3, Section C of Instructions for EPA Part 71 A-Comp form:

In addition, when making a determination of compliance status, § 71.6((c)(5)(iii)(B) requires you to consider all other material information you have in order to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information. The term “other material information” refers to information or knowledge you have, whether that information or knowledge is required to be collected by the permit or not. As used here, this term is similar to the term “other credible evidence,” which refers to non-reference test methods and other information “readily available” to you that the permit may, or may not, require you to collect. The term “readily available information” refers to information that is readily available and already being utilized, such as engineering calculations, indirect emissions estimates, and direct measurement by various means, whether this information is required to be collected by a regulation or permit, or for some other purpose (this information may also constitute “credible evidence” or “material information”). Therefore, it is possible for you to certify to continuous compliance, provided you collect the monitoring data consistent with the permit, the data show no deviations or that there are deviations but they are all excused by the permit, and you know of no other material information (or “credible evidence”) that would lead you to a different compliance status conclusion. For the data to be collected consistent with the permit, you would have to collect them consistent with any permit terms concerning the collection of the data. Such permit terms might, for example, impose a limit on the amount of missing or invalid data. If the amount of missing or invalid data were to increase above the limit imposed in the permit, the data would not have been collected consistent with the permit, and you would only be able to certify to intermittent compliance.



Continuous and Intermittent Data

- **Continuous data:** the results of monitoring, including the results of instrumental or noninstrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure that is designed to serve as monitoring on a continuous basis, provided: (1) the number of data records generated is equivalent to the number of averaging periods for the permit term and condition over the reporting period of the compliance certification, (2) the data have the same averaging period as the permit term and condition, and (3) the data are in the same units as the permit term and condition, or correlated directly with that permit term and condition.
- **Intermittent data:** data which are not continuous data.



Compliance Status

- **Continuous compliance** means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for upsets or malfunctions during which compliance is not required. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and noninstrumental (e.g., visual observation, inspection, recordkeeping) forms of monitoring.
- **Intermittent compliance** means any form of compliance other than continuous compliance.

TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

FACILITY INFORMATION

Facility/Permittee Name: _____
Co-Permittee Name(s): _____
Facility Location: _____
AIRS Facility No.: _____
Facility Contact: _____ Ph: _____ Fax: _____

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: _____ Issuance Date: _____
Tier I Operating Permit No.: _____ Issuance Date: _____
Compliance Reporting Period: From: _____ To: _____
Is This Intended To Be A Semiannual Report Also? ☐ Yes ☐ No
Deviations Reported This Period? ☐ Yes ☐ No

List of Attachments: ☐ Annual Compliance Certification Table (Form AQ-C2) No. of Pages: _____
☐ Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: _____
☐ Other: _____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____

Certification of Truth, Accuracy, and Completeness (by Responsible Official)

I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature Responsible Official Title Date

Print or Type Responsible Official Name

Co-Permittee Responsible Official Signature Co-Permittee Responsible Official Title Date

Print or Type Co-Permittee Responsible Official Name

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

In accordance with IDAPA 58.01.01.322.11, compliance with Tier I operating permits requires submission of an Annual Compliance Certification. The permittee may comply with these requirements by submitting completed copies of this Annual Compliance Certification (Form AQ-C1), the Annual Compliance Certification Table (Form AQ-C2), and the Semiannual Deviation Summary Table (Form AQ-C3) to DEQ and EPA Region 10. As these forms incorporate the reporting requirements of the Semiannual Report (see IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Forms AQ-C4 and AQ-C5) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line.

Compliance Reporting Period:

Enter the time period which is addressed by this Annual Compliance Certification (e.g., January 10, 2003 to January 9, 2004).

Is this certification intended to be a Semiannual Report also?

Check either yes or no to indicate if this certification is intended to be a Semiannual Report. If yes, this certification must meet the requirements for a Semiannual Report (IDAPA 58.01.01.322.08) in addition to the requirements for an Annual Compliance Certification (IDAPA 58.01.01.322.11). If this Annual Compliance Certification is also a Semiannual Report, the Semiannual Report does not need to be submitted. The Semiannual Report information can be provided on the Annual Compliance Certification Table (Form AQ-C2) and, if necessary, the Semiannual Deviation Summary Table (Form AQ-C3).

Deviations Reported this Period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. For an Annual Compliance Certification, consider the entire annual interval, not just the most recent semiannual reporting period. If the answer is yes for the most recent six-month reporting period, then attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Annual Compliance Certification.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for an Annual Compliance Certification. Without this certification, the Annual Compliance Certification does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125]

2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.

[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Annual Compliance Certification to the DEQ Regional Office and the U.S. EPA Region 10 office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

Facility/Permittee Name: _____ Tier I Operating Permit No.: _____
Facility Location: _____ Issuance Date: _____
AIRS Facility No.: _____ Compliance Reporting Period: _____

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

The Annual Compliance Certification must address all terms and permit conditions that were applicable during the reporting period. To comply with the requirements of IDAPA 58.01.01.322.11, complete an Annual Compliance Certification Table (Form AQ-C2) for each Tier I operating permit that was effective during the reporting period. If more than one Tier I operating permit existed during the reporting period, do not repeat information that is identical between the permits. For example, if the Tier I operating permit was amended or modified during the reporting period, include all permit conditions on the Annual Compliance Certification Table (Form AQ-C2) for the most recently issued permit. For the Annual Compliance Certification Table (Form AQ-C2) completed for the preceding permit (i.e., the permit that was amended or modified), enter only those permit conditions that are different (i.e., not identical) from the permit conditions in the permit that it replaced.

Column 1: Permit Condition Number

Enter the number of each permit condition or term exactly as it appears in the Tier I permit.

Column 2: Compliance Determination Methods

Identify the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by the Tier I operating permit; this includes at a minimum any testing and monitoring methods identified in the Tier I permit that were conducted during the relevant time period. The owner or operator may cross-reference the permit or previous reports to identify the various information elements required in a certification. This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided.

If necessary, the owner or operator shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information. Other material information includes information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status. This requirement does not impose a duty on the owner or operator to assess every possible piece of information that may have some undetermined bearing on compliance. If other material information is specified as a compliance determination method, also indicate in Column 2 if the monitoring frequency is continuous or intermittent.

Column 3: Monitoring Frequency

Indicate whether the data collected using the compliance determination method in Column 2 provided continuous or intermittent data. For example, if the permit condition requires the installation, calibration, maintenance and operation of a NO_x CEMS, then the monitoring frequency would most likely be "continuous." If the permit condition requires an annual performance test for PM-10, then the frequency would be "intermittent." In this column of the Table, enter "C" for continuous, "I" for intermittent, and "N/A" if monitoring frequency is irrelevant for the particular permit condition.

Continuous data means the results of monitoring, including the results of instrumental or noninstrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure that is designed to serve as monitoring on a continuous basis, provided: (1) the number of data records generated is equivalent to the number of averaging periods for the permit term and condition over the reporting period of the compliance certification, (2) the data have the same averaging period as the permit term and condition, and (3) the data are in the same units as the permit term and condition, or correlated directly with that permit term and condition. Intermittent data means data which are not continuous data.

Column 4: Deviations and Excess Emissions Events

Identify each deviation and excess emissions event associated with the Permit Condition in Column 1 that occurred during the Annual Compliance Certification reporting period. As noted above, the owner or operator may cross-reference previous reports to identify the various information elements required in a certification (e.g., "Refer to Excess Emission Reports dated 10/17/02, 10/18/02, 4/8/03, and 4/15/03; and Semiannual Deviation reports dated 4/20/03 and 10/20/02"). This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided.

Column 5: Compliance Status

The purpose of Column 5 is to report the status of compliance with the permit condition for the period covered by the certification, based on the method or means designated in Column 3. Enter the compliance status for each term and condition of the permit for the term covered by the Annual Compliance Certification by indicating whether compliance during the period was continuous (C) or intermittent (I). Each deviation identified during the reporting period shall be taken into account when determining the compliance status. If the emissions unit is subject to the CAM requirements of 40 CFR Part 64, then the compliance status decision should also identify as possible exceptions to compliance any periods during which an excursion or exceedance occurred.

Continuous compliance means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for those upsets or malfunctions during which compliance is not required pursuant to the underlying applicable requirement. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and noninstrumental (e.g., visual observation, inspection, recordkeeping) forms of monitoring. Intermittent compliance means any form of compliance other than continuous compliance.

Column 6: Attachments

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 6 of Form AQ-C2, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 2, 3, 4, and 5 of Form AQ-C2.



CASE STUDY

- Permit



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: T1-123456

AIRS NO.: 123-00045

AQCR: 064

CLASS: A

SIC: 1234

ZONE: 11

UTM COORDINATE (km): 500.0 , 5000.0

1. **PERMITTEE**
Bogus Widget Co.

2. **PROJECT**
Tier I Operating Permit

3. **MAILING ADDRESS**
P.O. Box 1234

CITY
Tealeaf

STATE
ID

ZIP
83123

4. **FACILITY CONTACT**
Earl Grey

TITLE
Plant Manager

TELEPHONE
(208) 888-8888

5. **RESPONSIBLE OFFICIAL**
Earl Grey

TITLE
Plant Manager

TELEPHONE
(208) 888-8888

6. **EXACT PLANT LOCATION**
1234 Country Road, Tealeaf, Idaho

COUNTY
Valley

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Widget manufacturing

8. **PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300-386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

STEPHEN E. WEST, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 8, 2002

DATE EXPIRES: June 8, 2007

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ACRONYMS, UNITS, and CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BWC	Bogus Widget Co.
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MMBtu/hr	million British thermal units per hour
MMscf/hr	million standard cubic feet per hour
NAAQS	National Ambient Air Quality Standards
NO _x	oxides of nitrogen
NSPS	New Source Performance Standards
O&M	Operations and Maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of ten micrometers or less
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TDS	total dissolved solids
T/d	tons-per-day
T/hr	tons-per-hour
T/mo	tons-per-month
T/yr	tons-per-year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002

Location: Tealeaf, Idaho

Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the *Rules for the Control of Air Pollution in Idaho*.
- 1.2 This Tier I permit incorporates the following permit(s):
- PTC No. 123-00045, issued September 5, 1995
 - Tier II Operating Permit No. 123-00045, issued March 11, 2002

Regulated Sources

- 1.3 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1. REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Boiler No. 1	None
4	Dryer No. 1	Scrubber No. 1
5	Material Handling Process	None / Baghouse No. 1

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456**Permittee:** Bogus Widget Co.**Facility (AIRS) No. 123-00045****Date Issued:** June 8, 2002**Location:** Tealeaf, Idaho**Date Expires:** June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1. APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.650-651	2.2-2.4, 2.17
2.5	Odors	No emissions of odorous gases, liquids, or solids	IDAPA 58.01.01.775-776	2.6, 2.17
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.17
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.17
2.10	Fuel oil sulfur content limit	ASTM Grade 1 – 0.3% by weight; ASTM Grade 2 – 0.5% by weight	IDAPA 58.01.01.728	2.10.1, 2.17
2.11	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.17
2.12	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.17
2.13	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	2.17
2.14	Recycling and emissions reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82	2.17
2.15	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.16, 2.17
2.16	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	2.15, 2.17

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002

Location: Tealeaf, Idaho

Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.
Location: Tealeaf, Idaho

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002
Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.
Location: Tealeaf, Idaho

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002
Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

2.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

2.9.5.1 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

2.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

**[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00
(state-only, federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.
Location: Tealeaf, Idaho

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002
Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Sulfur Content

2.10 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

2.10.1 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Open Burning

2.11 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

[IDAPA 58.01.01.600-616, 4/5/00]

Renovation/Demolition

2.12 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

2.13 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

Recycling and Emissions Reductions

2.14 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

Compliance Testing

2.15 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to the Department within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise ID, 83706-2239
Phone: (208) 373-0550

Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Test Methods

- 2.16 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2. EPA REFERENCE TEST METHODS

Pollutant	Test Method *	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring and Recordkeeping

- 2.17 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.18 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise ID, 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

3. EMISSIONS UNIT WB1: BOILER NO. 1**Summary Description**

The following is a narrative description of the boiler regulated in this Tier I operating permit. This description is for informational purposes only.

Boiler No. 1 is fired by natural gas or No. 1 fuel oil and is used to supply steam to processes at the facility. This boiler was manufactured by Steam Engineering Corp., was installed in 1957, and has a steaming capacity of 200,000 pounds of steam per hour.

Table 3.1 describes the devices used to control emissions from the Boiler No. 1.

Table 3.1. EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Boiler No. 1	None

Table 3.2 contains only a summary of the requirements that apply to Boiler No. 1. Specific permit requirements are listed below Table 3.2.

Table 3.2. APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.1	PM ₁₀ , CO	Refer to Table 3.3	Tier II Operating Permit No. 123-00045	3.5, 3.6
3.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.5, 3.7
3.3	PM	0.015 gr/dscf at 3% oxygen; 0.050 gr/dscf at 3% oxygen	Tier II Operating Permit No. 123-00045; IDAPA 58.01.01.677	None required
3.4	Fuel-firing rate	Most recent Department-approved performance test	Tier II Operating Permit No. 123-00045	3.5, 3.6

Permit Limits / Standard Summary

- 3.1 The PM₁₀ and CO emissions from Boiler No. 1 shall not exceed any corresponding emissions rate limits listed in Table 3.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

Table 3.3. BOILER NO. 1 EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
Boiler No. 1 / WB1 (fuel oil)	18.5	49.7	19.4	80.0

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 3.2 The emissions from Boiler No. 1 stack, or any other stack, vent, or other functionally equivalent opening associated with Boiler No. 1, shall comply with Permit Condition 2.7.
[IDAPA 58.01.01.625, 4/5/00; Tier II Permit No. 123-00045, 3/11/02]
- 3.3 The permittee shall not discharge PM to the atmosphere from Boiler No. 1 in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for natural gas, or in excess of 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for fuel oil.
[IDAPA 58.01.01.677, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]
- 3.4 The maximum allowable fuel oil-firing rate of Boiler No. 1 shall be limited to 120% of the average firing rate attained during the most recent performance test conducted pursuant to Permit Condition 3.5, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emission limit(s), unless such a firing rate would cause emissions to exceed any emission limit(s) set forth in this permit.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

Compliance Testing

- 3.5 Performance tests shall be conducted on Boiler No. 1, within one year of issuance of Tier II operating permit No. 123-00045, dated March 11, 2002, to demonstrate compliance with the emission limits for PM₁₀ and CO in Permit Condition 3.1 and for the PM emissions limit in Permit Condition 3.3. The test shall be performed while firing No. 1 fuel oil exclusively in the boiler.
- 3.5.1 The permittee shall conduct performance tests for CO, PM₁₀, and PM using the test methods outlined in 40 CFR 60, Appendix A, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157.
- 3.5.2 The permittee shall monitor and record the steam production rate and the firing rate of Boiler No. 1 during the performance tests.
- 3.5.3 A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.322.06, 07, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; Tier II Permit No. 123-00045, 3/11/02]

Monitoring & Recordkeeping Requirements

- 3.6 The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the fuel-firing rate of Boiler No. 1. The type of fuel fired shall be recorded each time the fuel type is changed. The average daily firing rate shall be recorded in gallons per hour. The gas-firing rate for each consecutive 12-month period shall be recorded in gallons per year. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]
- 3.7 The permittee shall comply with Permit Condition 2.8.
[IDAPA 58.01.01.322.06, 07, 08, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. EMISSIONS UNIT WD1: DRYER NO. 1**Summary Description**

The following is a narrative description of Dryer No. 1 regulated in this Tier I operating permit. This description is for informational purposes only.

Dryer No. 1 is a direct-fired, rotary dryer, used to dehydrate raw widgets. The dryer is fired exclusively by natural gas, and exhaust gasses are passed through a spray-impingement scrubber prior to atmospheric release. The dryer was manufactured by Widgets Inc., installed in 1995, and has a rated capacity of 50 T/hr.

Table 4.1 describes the control devices used in controlling emissions from Dryer No. 1.

Table 4.1. EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emission Control Device
Dryer No. 1	One spray-impingement scrubber

The following table contains a summary of requirements that generally apply to Dryer No. 1. Specific permit requirements are listed below Table 4.2.

Table 4.2. APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
4.1	PM ₁₀ , CO	Refer to Table 4.3	Tier II Operating Permit No. 123-00045	4.6-4.9
4.2	PM	Process weight	IDAPA 58.01.01.701; Tier II Operating Permit No. 123-00045	4.6-4.9
4.3	Dryer throughput	50 T/hr and 438,000 T/yr	Tier II Operating Permit No. 123-00045	4.7
4.4	Scrubber operation	Refer to Permit Condition 4.4	Tier II Operating Permit No. 123-00045	4.8, 4.9

Permit Limits / Standard Summary

- 4.1 The PM₁₀ and CO emissions from Dryer No. 1 shall not exceed any corresponding emissions rate limits listed in Table 4.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

Table 4.3. DRYER NO. 1 EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀		CO	
	lb/hr	T/yr	lb/hr	T/yr
Dryer No. 1 / WD1	37.0	93.8	6.0	26.3

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4.2 No person shall emit particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour, and PW is the process weight rate in pounds per hour. The averaging period for this limit is one hour in accordance with IDAPA 58.01.01.700.03.

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is greater than or equal to 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00; Tier II Permit No. 123-00045, 3/11/02]

4.3 The maximum throughput rate of Dryer No. 1 shall not exceed 50 T/hr and 438,000 T/yr.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

4.4 The permittee shall operate the scrubber as specified below:

4.4.1 The water flow of the scrubber shall be maintained within the range of 25 to 250 gallons per minute;

4.4.2 The pressure drop across the scrubber shall be maintained within the range from 3 to 10 inches of water column;

4.4.3 The concentration of TDS in the recirculated water shall not exceed 18,000 mg/l of water;

4.4.4 Whenever the water flow rate to the scrubber are not within the allowable operating ranges specified above, the permittee shall take corrective action as expeditiously as practicable to bring the scrubber water flow rate back to the allowable range.

4.4.5 Whenever the total concentration of TDS in the recirculated water of the scrubber is above the allowable value, the permittee shall take corrective action as expeditiously as practicable to bring it below the allowable value. All deviations shall be reported in accordance with Permit Condition 2.9 and General Provision 25.

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

4.5 At least once each year during a planned maintenance outage, or as needed during operation, the scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the scrubber to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

Compliance Testing

4.6 Performance tests shall be conducted on Dryer No. 1, within one year of issuance of this permit, to demonstrate compliance with the emission limits for PM₁₀ in Permit Condition 4.1 and for the PM emissions limit in Permit Condition 4.2.

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Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 4.6.1 The permittee shall conduct performance tests for PM and PM₁₀ using the test methods outlined in 40 CFR 60, Appendix A, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157.
- 4.6.2 A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- 4.6.3 The process weight input shall be calculated using the operating data recorded during the performance test. Appropriate parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried widgets produced, dried widget moisture content, fuel heating value, fuel input per ton of dried widgets, quantity of additives, solids content of the additives, and throughput to Dryer No. 1.
- 4.6.4 The permittee shall collect a representative sample of recirculated water from the scrubber during each compliance test. The total concentration of TDS in the recirculated water sample shall be analyzed and recorded and expressed in microgram solids per liter of water.
- 4.6.5 The permittee shall record the pressure drop across the scrubber, water flow of the scrubber, and water pressure of sprays in Dryer No. 1.
- 4.6.6 If the PM measured during in the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 4.2, no further testing shall be required during this term of this permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 4.2, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 4.2, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

Monitoring & Recordkeeping Requirements

- 4.7 The permittee shall continually monitor the widget input to Dryer No. 1. The average hourly input shall be calculated and recorded daily. The permittee shall calculate and record the average monthly amount of widgets input to Dryer No. 1 in T/mo. The monthly average shall be used to determine an annual amount recorded on a 12-month rolling basis. In the event the monitoring device(s) becomes inoperable, it shall be repaired or replaced as soon as practicable.
- 4.8 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate and pressure drop across the scrubber. The flow rate and pressure drop shall be recorded weekly. In the event the monitoring device(s) becomes inoperable, it shall be repaired or replaced as soon as practicable.
- 4.9 The permittee shall collect a representative sample of recirculated water from the scrubber monthly. The concentration of TDS in the recirculated water sample shall be analyzed and recorded. The result shall be expressed in microgram solids per liter of water.

[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. EMISSIONS UNIT WT1: MATERIAL HANDLING PROCESS

Summary Description

The following is a narrative description of the material handling process regulated in this Tier I operating permit. This description is for informational purposes only.

Material handling involves the transfer of dried widgets from Dryer No. 1 to either a 66-ton capacity bin (for reintroduction to the dryer), or to the 200-ton widget final storage bin.

Table 5.1 describes the devices used to control emissions from the material handling process.

Table 5.1. EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Transfer of widgets to recycle storage bin	Uncontrolled
Transfer of the widgets from Dryer No.1 through the screws and into the final storage bin	Baghouse No. 1

Table 5.2 contains a summary of the requirements that apply to the material handling process. Specific permit requirements are listed below Table 5.2.

Table 5.2. APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
5.1	PM ₁₀	1,6 lb/hr, 6.8 T/yr limits	Tier II Operating Permit No. 123-00045	5.7
5.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	Tier II Operating Permit No. 123-00045	2.8
5.3	Fugitive emissions	Reasonable control	Tier II Operating Permit No. 123-00045; IDAPA 58.01.01.650	2.2-2.4
5.4	PM	Process weight	IDAPA 58.01.01.702	None required
5.5	Final storage bin input	6 T/hr and 4575 T/yr	Tier II Operating Permit No. 123-00045	5.7

Permit Limits / Standard Summary

- 5.1 The PM₁₀ emissions from Baghouse No. 1 shall not exceed any corresponding emissions rate limits listed in Table 5.3:

[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

Table 5.3. BAGHOUSE NO. 1 EMISSIONS LIMITS

Source Description / Unit Number	PM ₁₀	
	lb/hr	T/yr
Baghouse No. 1 / WBH1	1.6	6.8

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 5.2 All emissions associated with material handling process shall comply with Permit Condition 2.7.
[IDAPA 58.01.01.625, 4/5/00; Tier II Permit No. 123-00045, 3/11/02]
- 5.3 All fugitive emissions associated with material handling process shall comply with Permit Condition 2.1
[IDAPA 58.01.01.650, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]
- 5.4 No person shall emit into the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.
- a. If PW is less than 17,000 lb/hr,
$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 17,000 lb/hr,
$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00 Tier II Permit No. 123-00045, 3/11/02]
- 5.5 The material handling process final storage bin shall receive no more than 6 tons of widgets per hour, and 4,575 tons of widgets per year.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]
- 5.6 At least once each year during a planned maintenance outage, or as needed during operation, Baghouse No. 1 shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the baghouse to ensure efficient operation.
[IDAPA 58.01.01.322.01, 3/19/99; Tier II Permit No. 123-00045, 3/11/02]

Monitoring & Recordkeeping Requirements

- 5.7 The permittee shall monitor and record daily the amount, in tons-per-hour (T/hr), of widgets transferred to the final storage bin. The permittee shall calculate and record the total monthly amount, in tons-per-month (T/mo), of widgets transferred to the final storage bin. The monthly total shall be used to determine an annual amount recorded on a 12-month rolling basis. In the event the monitoring device(s) becomes inoperable, it shall be repaired or replaced as soon as practicable.
[IDAPA 58.01.01.322.06, 07, 5/1/94; Tier II Permit No. 123-00045, 3/11/02]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1. INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Storage tanks and vessels with less than 260 gallon capacity with appropriate closures	IDAPA 58.01.01.317.01(b)(i)(1)
Storage tanks and vessels with less than 1,100 gallon capacity with appropriate closures, not for use with HAPs, and with a maximum vapor pressure of 550 mmHg	IDAPA 58.01.01.317.01(b)(i)(2)
Various natural gas-fired air makeup units rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Diesel-fired emergency generators rated less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Welding using less than 1 T/day	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gallons per day	IDAPA 58.01.01.317.01(b)(i)(12)
Various water-cooling towers that are non-process-contact coolers and not greater than 10,000 gallons per minute	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gallons per day of water	IDAPA 58.01.01.317.01(b)(i)(16)
Natural gas, propane, or kerosene-fired space heaters rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(18)
Cleaning and stripping activities and equipment using solutions with less than 1% VOCs by weight	IDAPA 58.01.01.317.01(b)(i)(26)
Storage and handling of water-based lubricants for metal working with an organic content of less than 10%	IDAPA 58.01.01.317.01(b)(i)(27)

- 6.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002

Location: Tealeaf, Idaho

Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i and 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15); 40 CFR 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Clean Air Act section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:

- 14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

- 14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.	Facility (AIRS) No. 123-00045	Date Issued: June 8, 2002
Location: Tealeaf, Idaho		Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 18.1 The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application 9 months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- 18.2 If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.
Location: Tealeaf, Idaho

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002
Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

- 19.2 The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- 19.3 Nothing in this permit shall alter or affect the following:
- 19.3.1 Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- 19.3.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 19.3.3 The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- 19.3.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, and 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, and 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20.1 For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- 20.2 For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- 20.3 For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- 20.4 For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9 and 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]**

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- 21.1 Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002

Location: Tealeaf, Idaho

Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
- 21.3.4 Such other facts as the Department may require to determine the compliance status of the source.
- 21.4 All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended;
62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six (6) months starting six (6) months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-123456

Permittee: Bogus Widget Co.
Location: Tealeaf, Idaho

Facility (AIRS) No. 123-00045

Date Issued: June 8, 2002
Date Expires: June 8, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]



CASE STUDY

- Chronology of Events

Chronology of Events at the Bogus Widget Company

Deviation Date	Description	Is This an Excess Emissions Event in Accordance with Sections 130-136	Was This Reported as a Deviation in the First Semi-Annual Report	Was This Reported in the Annual Compliance Certification	Was a Deviation Report Submitted as Part of the Annual Compliance Certification
First Semiannual Reporting Period					
8/11/02-8/15/02	Exceedance of fuel oil firing rate limit in Boiler No. 1; see attachment A	No	Yes	Yes	No ¹
10/5/02-10/6/02	Material handling process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment B	No	Yes	Yes	No ¹
10/12/02-10/15/02	Material Handling Process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment B	No	Yes	Yes	No ¹
10/28/02-11/2/02	Material Handling Process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment B	No	Yes	Yes	No ¹
Second Semiannual Reporting Period					
2/5/03	Material Handling Process visible emissions noted. Method 9 test revealed opacity exceeded 20% for more than three minutes in a one hour period. Determined to be a blown bag. Attachment C.	Yes		Yes	No ²
3/5/03	Material Handling Process visible emissions noted. Source unknown. Attachment C.			Yes	
4/10/03 to 4/13/2003	PM-10 emissions exceeded during source test	No		Yes	Yes
January, 2003	Required TDS sample was lost in the mail and no make up sampling had been performed	No		Yes	Yes
2/10/03-2/23/03	The TDS concentration in the scrubber water exceeded the permit limit of 18,000 mg per liter	No		Yes	Yes
4/8/03-4/10/03	Material Handling Process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment F	No		Yes	Yes
4/18/03-4/19/03	Material Handling Process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment F	No		Yes	Yes
4/25/03-4/28/03	Material Handling Process average hourly widget throughput exceeded limit in condition 5.5; emissions are controlled by baghouse so exceedance of PM-10 emission limit in condition 5.1 is reasonably not expected to have occurred; see attachment F	No		Yes	Yes

¹ The ACC is only required to contain deviation reports associated with the second semiannual reporting period.

² The event was reported pursuant to Sections 130-136, so a deviation report was not required.



CASE STUDY

- Semiannual Report

INSTRUCTIONS FOR TIER I SEMIANNUAL REPORT

FORM AQ-C4

In accordance with IDAPA 58.01.01.322.08.b and c, compliance with Tier I operating permits requires submittal of a Semiannual Report. The permittee may comply with these requirements by submitting completed copies of this Semiannual Report (Form AQ-C4), the Semiannual Monitoring Table (Form AQ-C5), and the Semiannual Deviation Summary Table (Form AQ-C3), to the Department. As the Annual Compliance Certification (Form AC-C1) and the Annual Compliance Certification Table (Form AQ-C2) incorporate the reporting requirements of the Semiannual Report (in accordance with IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line. Add more lines as needed.

Compliance Reporting Period:

Enter the time period which is addressed by this Semiannual Report (e.g., January 10, 2003 to July 9, 2003).

Deviations reported this period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. If the answer is yes, then attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Semiannual Report.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for a Semiannual Report. Without this certification, the Semiannual Report does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Semiannual Report to the DEQ Regional Office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.



SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Facility Name:	<u>Bogus Widget Company</u>	Permit No.:	<u>T1-123456</u>
Facility Location:	<u>1234 Country Road, Tealeaf, Idaho</u>	Issuance Date:	<u>6-8-02</u>
Facility ID (AIRS No.):	<u>123-00045</u>	Compliance Reporting Period:	<u>6-8-02 through 12-7-02</u>

1 Permit Condition	2 Condition Title / Description	3 Comments
SECTION 2: FACILITY-WIDE CONDITIONS		
2.2	Monitor and record frequency of methods used for reasonable control of fugitive dust	Dirt roads watered weekly. Log maintained at facility; available upon request.
2.3	Maintain records of all fugitive dust complaints received	No complaints this period. Log maintained at facility; available upon request.
2.4	Monthly facility-wide inspections of potential sources of fugitive emissions	Inspections conducted monthly. No fugitive emissions problems noted. Log maintained at facility; available upon request.
2.6	Maintain records of all odor complaints received	No complaints this period. Log maintained at facility; available upon request.
2.8	Monthly facility-wide inspections of potential sources of visible emissions	Inspections conducted monthly. No VE problems noted. Log maintained at facility; available upon request.
2.10.1	Maintain documentation of supplier verification of distillate fuel oil content on an as-received basis	Records maintained at facility; available upon request.
2.15	Notify DEQ of intent to test 15 days prior to test; test in accordance with IDAPA 58.01.01.157; submit protocol 30 days in advance; submit test report 30 days after test	This condition was met for the Boiler No. 1 test conducted on 6/15/02
2.17	Maintain sufficient records to assure compliance with all terms and conditions in the Tier I permit	Records maintained at the facility; available upon request
SECTION 3: BOILER NO. 1 (WB1)		
3.5	Performance tests for Boiler No. 1, within one year of issuance of Tier II operating permit No. 123-00045, dated March 11, 2002, to demonstrate compliance with the emission limits for PM ₁₀ and CO in Permit Condition 3.1 and for the PM emissions limit in Permit Condition 3.3	Performance tests conducted on 6/15/02. Submitted to DEQ on 7/15/02. Approved by DEQ on 9/10/02. Test report maintained at facility; available upon request.
3.6	Fuel firing rate monitoring requirements (continuous fuel-firing rate monitoring, record fuel-type fired each time the fuel type is changed, record the average daily firing rate, record the gas-firing rate for each consecutive 12-month period)	Firing rate monitoring was performed as required. Records maintained at facility; available upon request. An exceedance of the allowable fuel oil firing rate in Permit Condition 3.4 (120% of source test) occurred from 8/11/02 through 8/15/02 - see deviation report.
3.7	Compliance with Permit Condition 2.8	Inspections conducted monthly. No VE problems noted. Log maintained at facility; available upon request.
SECTION 4: DRYER NO. 1 (WD1)		
4.5	Inspect Dryer No. 1 scrubber at least once per year	Dryer No. 1 scrubber was inspected on 10/16/02 in per permit condition 4.6
4.6	Performance tests shall be conducted on Dryer No. 1, within one year of issuance of the Tier I permit, to demonstrate compliance with the emission limits for PM ₁₀ in Permit Condition 4.1 and for the PM emissions limit in Permit Condition 4.2	Performance tests scheduled for April, 2003
4.7	Dryer No. 1 input monitoring / recordkeeping requirements. (Continuous input monitoring, calculate / record the average hourly input, calculate / record the average monthly input in T/mo, record annual input on a 12-month rolling basis)	Input rate within limits of Permit Condition 4.3 (50 T/hr and 438,000 T/yr). Records maintained at facility; available upon request.



SEMIANNUAL MONITORING TABLE

FORM AQ-C5

1 Permit Condition	2 Condition Title / Description	3 Comments
4.8	Scrubber monitoring / recording requirements (continuous flow rate and pressure drop monitoring; recorded weekly)	Scrubber water flow rate and pressure drop maintained within parameters of Permit Condition 4.4. Records maintained at facility; available upon request.
4.9	Concentration of TDS in the recirculated scrubber water shall be analyzed and recorded monthly	TDS concentration within parameters of Permit Condition 4.4. Records of TDS analyses maintained at facility; available upon request.
SECTION 5: MATERIAL HANDLING PROCESS (WT1)		
5.6	Inspect Baghouse No. 1 at least once per year	The annual inspection was not performed during this semiannual reporting period
5.7	Throughput monitoring / recording requirements (monitor and record daily amount of widgets transferred to final storage bin, calculate and record the average monthly amount of widgets transferred to final storage bin, record annual amount transferred to final bin on a 12-month rolling basis).	Throughput exceeded limits of Permit Condition 5.5 on three separate occasions – see deviation report. Throughput records maintained at facility; available upon request.

INSTRUCTIONS FOR SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Column 1: Permit Condition Number

Enter the number of each permit condition or term that addresses monitoring, exactly as it appears in the Tier I permit.

Column 2: Permit Condition Title or Description

Enter the permit condition title or a brief summary to describe the requirement(s) of the permit condition.

Column 3: Comments

Describe the monitoring that was conducted during the reporting period.

- Monitoring includes any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the record keeping associated with that monitoring. For example, this would include fuel use or process rate monitoring, fuel analyses, operational or control device parameter monitoring (e.g., pressure drop), hours of operation, etc.
- Monitoring includes conditions for testing and the recordkeeping associated with that testing.
- Information may also be provided for any other material information which will be used to determine compliance status in the Annual Compliance Certification (i.e., information beyond monitoring which is specifically required which may potentially affect compliance status).
- Note that each instance where monitoring was not performed as specified in the permit is a deviation. This must be entered into the Semiannual Deviation Summary Table (Form AQ-C3) if not previously reported.
- In Column 3, also provide a brief description of each deviation that occurred during this semiannual reporting period and how it impacted the monitoring condition in Column 1. This includes deviations reported on the Deviation Summary Table (Form AQ-C3) as well as other deviations that were reported promptly at an earlier date (e.g., excess emissions events, NSPS report per 40 CFR 60.7(c), etc.).



TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility Name: Bogus Widget Company
Facility Location: 1234 Country Road, Tealeaf, Idaho
Facility ID (AIRS No.): 123-00045

Permit No.: T1-123456
Issuance Date: 6-8-02
Compliance Reporting Period: 6-8-02 through 12-7-02

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1	3.4	Boiler No.1	Fuel-firing limit for No. 1 fuel oil	8/11/ 2002	9:00 AM	8/15/ 2002	3:00 PM	this report	Exceeded capacity of boiler by 100 gal/hr	Installation of feed-back loop controls to prevent future exceedences	A
2	5.5	Material Handling Process	Exceeded throughput limits	10/5/ 2002	8:45 AM	10/6/ 2002	5:05 PM	this report	Operator Oversight	Talked to operators	B
3	5.5	Material Handling Process	Exceeded throughput limits	10/12/ 2002	10:45 AM	10/15/ 2002	1:05 PM	this report	Operator Oversight	Talked to operators	B
4	5.5	Material Handling Process	Exceeded throughput limits	10/28/ 2002	9:10 AM	11/2/ 2002	3:05 PM	this report	Operator Oversight	Talked to operators	B

INSTRUCTIONS FOR TIER I DEVIATION SUMMARY TABLE

FORM AQ-C3

The purpose of the Semiannual Deviation Summary Table (Form AQ-C3) is to provide information required by IDAPA 58.01.01.322.08. Each and every permit condition is subject to prompt deviation reporting. Deviation reports are due at least every six months unless the permit specifies another time frame. All instances of deviations from permit requirements must be clearly identified in the report. Deviations attributable to excess emissions must be reported in accordance with IDAPA 58.01.01.130-136 and, therefore, are not required to be addressed on this form.

Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard .
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventive Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.

Attachment A

1. From 8/11/02 through 8/15/02, the No. 1 fuel oil-firing rate was 2000 gal/hr which slightly exceeded the limit established in Permit Condition 3.4 by 100 gal/hr. The boiler was running at maximum capacity, with respect to steam-generation, and the excess firing rate was not noted until 8/20/02. This event may have resulted in an exceedence of the PM-10 and/or CO emissions limits in Permit Condition 3.1.

Prior to this event, Bogus Widget Co. was not aware that the boiler could exceed the fuel-firing rate limit in condition 3.4. Since the event, Bogus Widget Co. has installed (9/1/02) a valve and feed-back loop monitoring system that will prevent any future exceedences.

Attachment B

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the months of October and November. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.



CASE STUDY

- Annual Compliance Certification

TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

FACILITY INFORMATION

Facility/Permittee Name: Bogus Widget Company
Co-Permittee Name(s): _____
Facility Location: 1234 Country Road, Tealeaf, Idaho
AIRS Facility No.: 123-00045
Facility Contact: Earl Grey Ph: 208 888-8888 Fax: 208 999-9999

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: T1-123456 Issuance Date: 6/8/02
Compliance reporting period: From: 6/8/02 To: 6/7/03
Is this intended to be a Semiannual Report also? ☒ Yes ☐ No
Deviations reported this period? ☒ Yes ☐ No

List of Attachments: ☒ Tier I Annual Compliance Certification Table (Form AQ-C2) No. of Pages: 6
☒ Tier I Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: 1
☒ Other: Attachment A No. of Pages: 1
Attachment B No. of Pages: 1
Attachment C No. of Pages: 1
Attachment D No. of Pages: 1
Attachment E No. of Pages: 1
Attachment F No. of Pages: 1

Certification of Truth, Accuracy, and Completeness (by Responsible Official)

I, certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature Plant Manager Responsible Official Title 6/23/2003
Date

Earl Grey
Responsible Official Printed Name

Co-Permittee Responsible Official Signature Co-Permittee Responsible Official Title Date

Co-Permittee Responsible Official Printed Name

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

In accordance with IDAPA 58.01.01.322.11, 5/1/94, compliance with Tier I operating permits requires submission of an Annual Compliance Certification. The permittee may comply with these requirements by submitting completed copies of this Annual Compliance Certification (Form AQ-C1), the Annual Compliance Certification Table (Form AQ-C2), and the Semiannual Deviation Summary Table (Form AQ-C3) to DEQ and EPA Region 10. As these forms incorporate the reporting requirements of the Semiannual Report (see IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line. Add more lines as needed.

Compliance Reporting Period:

Enter the time period which is addressed by this Annual Compliance Certification (e.g., January 10, 2003 to January 9, 2004).

Is this certification intended to be a Semiannual Report also?

Check either yes or no to indicate if this certification is intended to be a Semiannual Report. If yes, this certification must meet the requirements for a Semiannual Report (IDAPA 58.01.01.322.08) in addition to the requirements for an Annual Compliance Certification (IDAPA 58.01.01.322.11). If this Annual Compliance Certification is also a Semiannual Report, the Semiannual Report (Form AQ-C4) does not need to be submitted. The Semiannual Report (Form AQ-C4) information can be provided on the Annual Compliance Certification Table (Form AQ-C2), and if necessary, the Semiannual Deviation Summary Table (Form AQ-C3).

Deviations reported this period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. For an Annual Compliance Certification, consider the entire annual interval, not just the most recent semiannual reporting period. If the answer is yes for the most recent six-month reporting period, then attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Annual Compliance Certification.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for an Annual Compliance Certification. Without this certification, the Annual Compliance Certification does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Annual Compliance Certification to the DEQ Regional Office and the U.S. EPA Region 10 office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

Facility Name:	<u>Bogus Widget Company</u>	Tier I Operating Permit No.:	<u>T1-123456</u>
Facility Location:	<u>1234 Country Road, Teleaf, Idaho</u>	Issuance Date:	<u>6/8/02</u>
AIRS Facility No.:	<u>123-00045</u>	Compliance Reporting Period:	<u>6/8/02 through 6/7/03</u>

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.1	Permit Conditions 2.2-2.4	I		C	
2.2	Dirt roads watered weekly. Log maintained at facility; available upon request.	I		C	
2.3	No complaints this period. Log maintained at facility; available upon request.	I		C	
2.4	Inspections conducted monthly. No fugitive emissions problems noted. Log maintained at facility; available upon request.	I		C	
2.5	Permit Condition 2.6	I		C	
2.6	No complaints this period. Log maintained at facility; available upon request.	I		C	
2.7	Permit Condition 2.8	I	Emissions exceeded 20% opacity on 2/5/03 at the baghouse. Potential VE event on 3/5/03 could not be confirmed.	I	C
2.8	Inspections conducted monthly. Refer to Attachment C for additional information. Log maintained at facility; available upon request.	I		C	C
2.9	See compliance with 2.9.1-2.9.5.2	N/A		C	
2.9.1	Corrective action taken on 2/5/03. Records maintained at facility; available upon request.	I		C	C

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.9.2	Notification	N/A		C	C
2.9.3	Notification occurred on 2/5/03.	I		C	C
2.9.4	Report filed on 2/5/03	I		C	C
2.9.5	Records maintained at facility; available upon request.	C		C	
2.10	Permit Condition 2.10.1	I		C	
2.10.1	Records maintained at facility; available upon request.	I		C	
2.11	No open burning conducted	N/A		C	
2.12	No renovation or demolition conducted	N/A		C	
2.13	Not Applicable	N/A		C	
2.14	Not Applicable	N/A		C	
2.15	Testing was performed pursuant to these conditions.	I		C	
2.16	Testing was performed using specified test methods.	I		C	
2.17	Recordkeeping system is kept up to date.	C		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.18	All periodic reports and certifications have been sent in on time.	I		C	
3.1	Permit Conditions 3.5 and 3.6	C	Fuel-Oil firing rate exceeded 8/11/02-8/15/02.	I	A
3.2	Permit Conditions 3.5 and 3.7	I		C	
3.3	None required (refer to tech memo for Tier 1 permit)	N/A		C	
3.4	Permit Conditions 3.5 and 3.6	C	Fuel-Oil firing rate exceeded 8/11/02-8/15/02.	I	A
3.5	Performance tests conducted on 6/15/02. Submitted to DEQ on 7/15/02. Approved by DEQ on 9/10/02.	I		C	
3.6	Fuel meter	C		C	
3.7	Inspections conducted monthly. Log maintained at facility; available upon request.	I		C	
4.1	Calculations based on Permit Conditions 4.6-4.9 and on source tests.	I	PM10 limit exceeded during source test conducted 4/10/03-4/13/03. Test report submitted to DEQ on 5/13/03.	I	D
4.2	Calculations based on Permit Conditions 4.6-4.9.	I		C	
4.3	Permit Condition 4.7	C		C	
4.4.1	Permit Condition 4.8	C		C	
4.4.2	Permit Condition 4.8	C		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
4.4.3	Permit Condition 4.9	I	Scrubber water sample taken 2/10/03 exceeded limit for TDS concentration.	I	E
4.4.4	Water flow meter	C		C	
4.4.5	Permit Condition 4.9	I		I	
4.5	Scrubber inspection performed on 10/16/02.			C	
4.6	Performance Tests conducted 4/10/03 thru 4/13/03. Test Report submitted to DEQ on 5/13/03.	I		C	
4.7	Widget production log - automated	C		C	
4.8	Measurement of scrubber water flow and pressure drops.	C		C	
4.9	Water collection and analysis	I	No scrubber water sample was analyzed during January. Sample was lost in transit.	I	E
5.1	Calculations based on data per Permit Condition 5.7.	C		C	
5.2	Permit Condition 2.8	I	Visible emissions from the materials handling area were observed to be in excess of 20% on 2/5/03. Visible emissions on 3/5/03 could not be confirmed.	I	C
5.3	Permit Conditions 2.2-2.4	I		C	
5.4	None required (refer to tech memo for Tier I permit).	N/A		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
5.5	See Permit Condition 5.7	C	Throughput limit was exceeded periodically during October, November, March and April. Records available upon request.	I	B, F
5.6	Visual inspection on 5-5-03	I		C	
5.7	Widget production log - automated	C		C	
7.1-7.3	None required	N/A		C	
7.4-7.5	None required	N/A		C	
7.6	None required	N/A		C	
7.7-7.8	One request from Department during reporting period - request was fulfilled within two weeks.	N/A		C	
7.9	None required	N/A		C	
7.10-7.11	None required	N/A		C	
7.12-7.13	None required	N/A		C	
7.14	None required	N/A		C	
7.15	Not Applicable	N/A		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
7.16	Fees, as assessed by the Department, were paid during this reporting period.	I		C	
7.17	Permit documents submitted to Department have been certified.	I		C	
7.18	Not applicable this reporting period	N/A		C	
7.19	None required	N/A		C	
7.20	Not applicable	N/A		C	
7.21	This certification is first annual certification for this permit term.	I		C	
7.22	See certification	N/A		C	
7.23	No such actions taken	C		C	
7.24	Semiannual report submitted on 12-23-02 and as part of this certification.	I		C	
7.25	See Permit Condition 2.9 for excess emissions semiannual report.	I		C	
7.26	Not applicable	N/A		C	
7.27	Not applicable	N/A		C	

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

The Annual Compliance Certification must address all terms and permit conditions that were applicable during the reporting period. To comply with the requirements of IDAPA 58.01.01.322.11, complete an Annual Compliance Certification Table (Form AQ-C2) for each Tier I operating permit that was effective during the reporting period. If more than one Tier I operating permit existed during the reporting period, do not repeat information that is identical between the permits. For example, if the Tier I operating permit was amended or modified during the reporting period, include all permit conditions on the Annual Compliance Certification Table (Form AQ-C2) for the most recently issued permit. For the Annual Compliance Certification Table (Form AQ-C2) completed for the preceding permit (i.e., the permit that was amended or modified), enter only those permit conditions that are different (i.e., not identical) from the permit conditions in the permit that it replaced.

Column 1: Permit Condition Number

Enter the number of each permit condition or term exactly as it appears in the Tier I permit.

Column 2: Compliance Determination Methods

Identify the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by the Tier I operating permit; this includes at a minimum any testing and monitoring methods identified in the Tier I permit that were conducted during the relevant time period. The owner or operator may cross-reference the permit or previous reports to identify the various information elements required in a certification. This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided.

If necessary, the owner or operator shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information. Other material information includes information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status. Note that the underlying 40 CFR Part 70 provision revised on October 22, 1997 does not impose a duty on the owner or operator to assess every possible piece of information that may have some undetermined bearing on compliance. If other material information is specified as a compliance determination method, also indicate in column 2 if the monitoring frequency is continuous or intermittent.

Column 3: Monitoring Frequency

If the permit condition is relied upon as a method to determine the compliance status of any term or condition of the permit, indicate whether the data collected using this method provided continuous or intermittent data. For example, if the permit condition requires the installation, calibration, maintenance and operation of a NO_x CEMS, then the monitoring frequency would most likely be "continuous." If the permit condition requires an annual performance test for PM-10, then the frequency would be "intermittent." In this column of the Table, enter "C" for continuous, "I" for intermittent, and "N/A" if monitoring frequency is irrelevant for the particular permit condition.

Continuous data means the results of monitoring, including the results of instrumental or noninstrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure that is designed to serve as monitoring on a continuous basis, provided: (1) the number of data records generated is equivalent to the number of averaging periods for the permit term and condition over the reporting period of the compliance certification, (2) the data have the same averaging period as the permit term and condition, and (3) the data are in the same units as the permit term and condition, or correlated directly with that permit term and condition. Intermittent data means data which are not continuous data.

Column 4: Deviations and Excess Emission Events

Identify each deviation or excess emission event associated with the Permit Condition in Column 1 which occurred during the Annual Compliance Certification reporting period. As noted above, the owner or operator may cross-reference previous reports to identify the various information elements required in a certification (e.g., "Refer to Excess Emission Reports dated 10/17/02, 10/18/02, 4/8/03, and 4/15/03; and Semiannual Deviation reports dated 4/20/03 and 10/20/02"). This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided. If the excess emission event has not been previously reported to the Department, but is being reported at this time, include all required information for that report as an attachment to the Annual Compliance Certification (Form AQ-C1).

Column 5: Compliance Status

The purpose of column 5 is to report the status of compliance with the permit condition for the period covered by the certification, based on the method or means designated in column 3. Enter the compliance status for each term and condition of the permit for the term covered by the Annual Compliance Certification by indicating whether compliance during the period was continuous (C) or intermittent (I). Each deviation identified during the reporting period shall be taken into account when determining the compliance status. If the emissions unit is subject to the CAM requirements of 40 CFR Part 64, then the compliance status decision should also identify as possible exceptions to compliance any periods during which an excursion or exceedance occurred.

Continuous compliance means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for upsets or malfunctions during which compliance is not required. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and noninstrumental (e.g., visual observation, inspection, recordkeeping) forms of monitoring. Intermittent compliance means any form of compliance other than continuous compliance.

Column 6: Attachments

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 6 of Form AQ-C2, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 2, 3, 4, and 5 of Form AQ-C2.



TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility Name: Bogus Widget Company
Facility Location: 1234 Country Road, Tealeaf, Idaho
AIRS Facility No.: 123-00045

Permit No.: T1-123456
Issuance Date: 6-8-02
Compliance Reporting Period: 12-8-02 through 6-7-03

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1	5.2	Material Handling Process	Visible Emissions	3/5/2003	10:30 AM	3/5/2003	11:00 AM	N/A	Unidentified	None needed	C
2	4.1	Dryer No. 1	PM ₁₀ emissions exceeded during source test	4/10/2003	9:00 AM	4/13/2003	5:00 PM	5/13/2003	Unidentified	Another source test is being scheduled and a consultant was hired to address emission reductions	D
3	4.9	Dryer No. 1 / Scrubber	TDS concentration in scrubber water not measured	1/1/2003	---	1/31/2003	---	this report	The monthly sample for January 2003 was lost in the mail	New sample was taken upon discovery that January sample was lost. We now use a different carrier	
4	4.4.3	Dryer No. 1 / Scrubber	TDS Concentration in water exceeded limit	2/10/2003	---	2/21/2003	9:00 AM	this report	Unidentified	Changed out scrubber water on 2/21/03	E
5	5.5	Material Handling Process	Exceeded throughput limits	4/8/2003	8:00 AM	4/10/2003	8:05 AM	this report	Operator Oversight	Talked to operators	F
6	5.5	Material Handling Process	Exceeded throughput limits	4/18/2003	1:45 PM	4/19/2003	5:05 PM	4/20/2003	Operator Oversight	Revised O & M manual	F
7	5.5	Material Handling Process	Exceeded throughput limits	4/25/2003	11:45 AM	4/28/2003	3:00 PM	this report	Operator Oversight	Trained operators	F

INSTRUCTIONS FOR TIER I DEVIATION SUMMARY TABLE

FORM AQ-C3

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Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard .
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventive Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.

Attachment A

1. From 8/11/02 through 8/15/02, the No. 1 fuel oil-firing rate was 2000 gal/hr which slightly exceeded the limit established in Permit Condition 3.4 by 100 gal/hr. The boiler was running at maximum capacity, with respect to steam-generation, and the excess firing rate was not noted until 8/20/02. This event may have resulted in an exceedence of the PM-10 and/or CO emissions limits in Permit Condition 3.1.

Prior to this event, Bogus Widget Co. was not aware that the boiler could exceed the fuel-firing rate limit in condition 3.4. Since the event, Bogus Widget Co. has installed (9/1/02) a valve and feed-back loop monitoring system that will prevent any future exceedences.

Attachment B

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the months of October and November. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.

Attachment C

(taken from V.E. Inspection Log)

1. During a monthly inspection (as required by Permit Condition 2.8) conducted on 2/5/03, at approximately 9:30AM, visible emissions were noted from Baghouse No. 1. Material handling activities were immediately stopped and an inspection of the baghouse was conducted. The inspection revealed a ruptured bag in the baghouse. The bag was replaced, and material handling activities were resumed by 12:00PM on 2/5/03. The visible emissions inspection was resumed by 12:30PM, and visible emissions were still noted from the baghouse. The plant manager elected to continue production; therefore, a Method 9 visible emissions test was conducted. The Method 9 test resulted in readings greater than 20% opacity aggregating for three minutes or more. By 3:00PM, there were no visible emissions noted at the baghouse. The event was reported as an excess emissions event on 2/5/03.
2. During a monthly inspection (Permit Condition 2.8) conducted on 3/5/03, at approximately 10:30AM, visible emissions were noted from the material handling area. Identification of the source of the visible emissions was attempted; however, the source was not identified. At approximately 11:00AM, there were no visible emissions observed in the material handling area.

Attachment D

Performance tests for PM and PM-10 emissions from the dryer were conducted from 4/10/03-4/13/03. DEQ was notified of the test dates on 3/15/03. A test protocol was submitted to DEQ on 2/15/03, and DEQ approval was granted on 3/15/03. EPA Test Methods 5, 201a, and 202 were conducted. The test results were sent to DEQ, in a written report, on 5/13/03.

The Method 5 test was conducted to demonstrate compliance with the process weight rate limits for PM emissions in Permit Condition 4.2. As demonstrated by the test results, the PM emitted during the test was well within the limits of Permit Condition 4.2, and no further testing for PM is required during the term of the permit (refer to Permit Condition 4.6.6).

The Method 201a and 202 tests were conducted to demonstrate compliance with the PM-10 emissions limit in Permit Condition 4.1. The test results indicated that PM-10 emissions during the test exceeded the permit limits by approximately 17%. Bogus Widget Co. is unclear as to why the permit limits were exceeded during the performance test, although investigations are currently underway. A meeting with DEQ personnel was held on 5/20/03 to discuss this issue and a second performance test is currently being scheduled for early July. In addition, a consultant was obtained to evaluate the dryer system and to address the potential emission reductions from that system.

Attachment E

(Taken from Scrubber Log at facility; available upon request)

1. No scrubber water sample was analyzed for TDS concentration during the month of January. The sample was collected on 1/10/03 and sent to the laboratory on 1/11/03; however, the sample was lost in transit. This error was not identified until early February, when the carrier notified Bogus Widget Co.
2. The TDS concentration exceeded the limits in Permit Condition 4.4.3 during the month of February. The scrubber water sample was taken on 2/10/03, and the analysis was returned from the laboratory on 2/20/03, indicating a TDS concentration of 25,000 mg/L. Scrubber water was changed out on 2/21/03 at the first available opportunity. The scrubber water was re-sampled on 2/23/03 and was within the limits of Permit Condition 4.4.3.

Attachment F

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the month of April. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.



FOCUS ON DEQ ACTIONS



Full Compliance Evaluation (FCE)

- **Comprehensive evaluation of compliance status of entire facility**
- **Addresses current compliance status as well as facility's continuing ability to comply**
- **Addresses all regulated pollutants at all regulated units through compliance with each permit condition**



FCE Elements - DEQ Review

- **Reports including the underlying records, as needed**
- **Reported monitoring data (e.g., CEM, continuous parameter monitoring reports, excess emissions reports)**
- **Annual Compliance Certifications (ACCs)**
- **Semiannual Monitoring Reports (SRs)**
- **Quarterly Compliance Schedule Progress Reports**



FCE Elements - DEQ Review (cont.)

- **Any other reports required by the permit**
- **Assess control device & process operating conditions**
 - Necessity for inspection depends on situation
- **VE observations as needed**
- **Review facility records and operating logs**
- **Assess process parameters (e.g., feed rates, raw material composition, other process rates)**



FCE Elements - DEQ Review (cont.)

- **Assess control equipment performance (e.g., water flow rate, pressure drop, temp, ESP power level, etc.)**
- **Review of stack test results**
- **Completion of FCE involves multiple “steps”**
- **Entered into AIRS upon completion of all steps**



Stack Tests for an FCE

- **Must review results of all stack tests required by permit**
- **Encourage facility to submit protocol for approval**



FCE - Overall Compliance Status Decision

- **A snapshot in time, at completion of FCE**
- **If there are any unresolved violations, facility is listed as “out”**



AIRS and ECHO Databases

- **Aerometric Information Retrieval System (AIRS)**
 - States required to enter specific data into AIRS
 - Limited access - state agencies only
- **Enforcement and Compliance History OnLine (ECHO)**
 - Subset of information contained in AIRS
 - Accessible online to general public
- **FCEs and PCEs and findings are entered in AIRS and may be viewed by general public**



Partial Compliance Evaluation (PCE)

- **Documented compliance assessment focused on a subset of requirements**
- **Purpose:**
 - Capture all state/local activity at significant sources
 - States/locals are recognized for these activities
 - Encourage accurate reporting and promote accuracy in database
 - Encourage greater public accessibility to information



INVESTIGATIONS



Investigations

- **Generally limited to a portion of a facility or a particular issue**
- **Resource and budget intensive**
- **In-depth assessment**
- **Used to address issues that are difficult to evaluate during a routine FCE due to time constraints and complexity of the issue**
- **DEQ Draft Plan - just a few each year**



Investigation Examples

- **NSR/PSD**
- **NSPS applicability**
- **Construction without a PTC**
- **Major source status/failure to get Tier I OP**
- **Possible “*sham*” synthetic minor permits**

Who to Contact for More Information

If your facility is located in Ada, Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Valley, or Washington County, your points of contact are:

Tim Trumbull, Air Quality Inspector -or-
Tom Krinke, Air Quality Science Officer
DEQ Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
(208) 373-0550
Fax: (208) 373-0287

or

Bill Rogers, Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Blaine, Camas, Cassia, Gooding, Jerome, Lincoln, Minidoka, or Twin Falls County, your points of contact are:

Bill Allred, Regional Manager/Air and Remediation -or-
Stephen VanZandt, Air Quality Science Officer
DEQ Twin Falls Regional Office
601 Pole Line Rd., Suite 2
Twin Falls, ID 83301
(208) 736-2190
Fax: (208) 736-2194

or

Bill Rogers, Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Bannock, Bear Lake, Bingham, Caribou, Franklin Oneida, or Power County, your points of contact are:

Rick Elkins, Inspection/Compliance Coordinator -or-
Larry Sims, Permit/Monitoring Coordinator
DEQ Pocatello Regional Office
444 Hospital Way, #300
Pocatello, ID 83201
(208) 236-6160
Fax: (208) 236-6168

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, or Teton County, your points of contact are:

Rensay Owen, Regional Manager-Air Quality -or-
Jorge Garcia, Air Quality Analyst
DEQ Idaho Falls Regional Office
900 N. Skyline, Suite B
Idaho Falls, ID 83402
(208) 528-2650
Fax: (208) 528-2695

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-015

If your facility is located in Benewah, Bonner, Boundary, Kootenai, or Shoshone County, your points of contact are:

Tom Harman, Air Quality Manager
DEQ Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
(208) 769-1422
Fax: (208) 769-1404

or

Bill Rogers
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154

If your facility is located in Clearwater, Idaho, Nez Perce, Latah, or Lewis County, your points of contact are:

Eric Kopczynski
Air Quality Analyst
DEQ Lewiston Regional Office
1118 "F" Street
Lewiston, ID 83501
(208) 799-4370, or toll free at 877-541-3304
Fax: (208) 799-3451

or

Mike Simon
Permits Coordinator
DEQ State Office - Air Quality Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502
Fax: (208) 373-0154